

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO: 00-6309-CR-SEITZ

Plaintiff,

JUDGE: SEITZ

v.

DAVID BELL,

Defendant.

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MOTION TO MODIFY CONDITIONS OF BOND

NOW COMES the Defendant, DAVID BELL, by and through his undersigned counsel, JEFFREY M. HARRIS, and respectfully prays unto this Honorable Court for an Order Modifying Conditions of Bond and as grounds therefore states the following:

1. The Defendant, David Bell, was released on bond on October 25, 2001.
2. One of the conditions of bond is that the Defendant must be home by 10:00 p.m.
3. The Defendant is married with four children and the curfew has created hardships in his personal and professional life.
4. Gavin Churchill, Pre-Trial Services Officer has no comment as to the Motion for Modification of conditions of Bond and acquiesces to the opinion of Brian McCormick, Assistant U.S. Attorney.
5. Assistant U.S. Attorney, Brian McCormick, after consulting with the lead agent, sees no need for the continuation of the curfew and does not object to the modification.

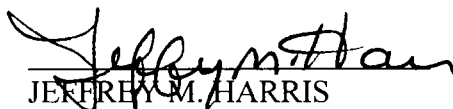
JEFFREY M. HARRIS, P.A.



WHEREFORE, the undersigned counsel respectfully prays unto this Honorable Court for an Order deleting the curfew as a condition of bond.

I HEREBY CERTIFY that a copy of this Motion has been furnished to the U.S. District Clerk of the Court, Federal Courthouse Square, 301 North Miami Avenue, Miami, Florida 33128, Brian McCormick, Esquire, United States Attorney's Office, 500 East Broward Boulevard, Suite 700, Fort Lauderdale, Florida 33394, and Gavin Churchill, Pre-Trial Services Officer, 299 East Broward Boulevard, Room 301, Fort Lauderdale, Florida 33301, this 21 day of February, 2002.

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